

## EXHIBIT B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:
UNITED STATES OF AMERICA,	:
	:
Plaintiff,	:
	:
-v.-	:
	:
	: <u>STIPULATION</u>
	:
	: 19 Civ. 4210 (PKC)
	:
THE BULK CARGO CARRIER K NOWN AS THE	:
“WISE HONEST,” BEARING INTERNATIONAL	:
MARITIME ORGANIZATION NUMBER 8905490,	:
	:
Defendant- <u>in-rem</u> .	:
-----	X
	:
Han Kim,	:
	:
Claimant,	:
	:
Yong Seok Kim,	:
	:
Claimant.	:
	:
-----	X

IT IS HEREBY AGREED, by and between the United States of America by its attorney Geoffrey S. Berman, United States Attorney for the Southern District of New York, Assistant United States Attorneys David W. Denton, Jr. and Benet J. Kearney, of counsel, and the Han Kim and Yong Seok Kim (together, the “Kims”), by their counsel, Robert J. Tolchin, Esq., that:

1. The Kims hereby withdraw the verified claim filed on September 19, 2019 asserting an interest in the Defendant-*in-rem* (D.E. 18), and consent to the forfeiture of the Defendant-*in-rem*.

2. This Stipulation may be executed in counterparts, each of which shall be deemed an original, and all of which, when taken together, shall be deemed the complete Stipulation. Signature pages may be by fax or transmitted electronically, and such signatures shall be deemed to be valid originals.

3. The parties hereby waive all rights to appeal or to otherwise challenge or contest the validity of this Stipulation.

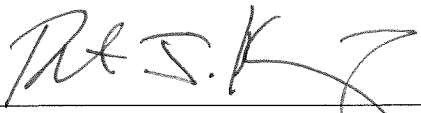
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4. Each party agrees to bear its costs and attorneys' fees.

Agreed and consented to:

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York  
Attorney for Plaintiff

By:

  
\_\_\_\_\_  
David W. Denton, Jr. / Benet J. Kearney  
Assistant United States Attorneys  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2744 / 2260

10/16/19

\_\_\_\_\_  
Date

HAN KIM and YONG SEOK KIM

By:

\_\_\_\_\_  
Robert J. Tolchin, Esq.  
Attorney for HAN KIM and YONG SEOK KIM  
The Berkman Law Office, LLC  
111 Livingston Street  
Suite 1920  
Brooklyn, New York 11201  
(718) 855 3627

\_\_\_\_\_  
Date

SO ORDERED:

\_\_\_\_\_  
THE HONORABLE P. KEVIN CASTEL  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK

\_\_\_\_\_  
Date

4. Each party agrees to bear its costs and attorneys' fees.

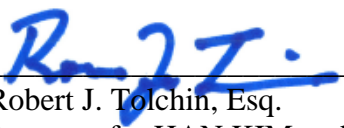
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United States Attorney for the  
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Attorney for Plaintiff

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David W. Denton, Jr. / Benet J. Kearney  
Assistant United States Attorneys  
One St. Andrew=s Plaza  
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(212) 637-2744 / 2260

10-16-19  
Date

HAN KIM and YONG SEOK KIM

By:  \_\_\_\_\_  
Robert J. Tolchin, Esq.  
Attorney for HAN KIM and YONG SEOK KIM  
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(718) 855 3627

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Date

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THE HONORABLE P. KEVIN CASTEL  
UNITED STATES DISTRICT JUDGE  
SOUTHERN DISTRICT OF NEW YORK

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Date